

EXHIBIT 4

From: [David Grassi](#)
To: ["Daniel Zemel"](#)
Cc: ["Chad Diamond"](#); ["Nicholas Linker"](#); [Chad Echols](#); [Salley Odom](#)
Subject: RE: Hallager v ARS Discovery Responses
Date: Friday, August 20, 2021 3:40:00 PM
Attachments: [image001.png](#)
[2021 8 20 HRRG Hallager \(Ltr Serving Notice of Dep\).pdf](#)
[2021 8 20 ARS Hallager \(Notice of Deposition of Plaintiff\).pdf](#)

Daniel,

Since I have not heard back from you regarding anything in my email below, and since the discovery window is quickly closing, we had no choice but to go ahead and set your client's deposition date. Please see the attached notice of deposition for your client, along with a cover letter serving same. I will also be sending a letter to the mediator shortly, since our deadline to mediate is also four weeks out.

As for deposition dates of my clients, they have indicated they have some availability during the first two full weeks of September. They cannot determine the exact availability without a topic list, since the designee would likely vary depending on the topics. Please forward that when you get a chance and we can get that date nailed down.

Let me know if you have any questions.

Thank you,

David A. Grassi
Attorney
The Echols Firm, llc
224 Oakland Ave. (29730)
P.O. Box 12645
Rock Hill, South Carolina 29731
[803.329.8982](tel:803.329.8982)
david.grassi@theecholsfirm.com



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From: David Grassi

Sent: Wednesday, August 11, 2021 5:34 PM

To: 'Daniel Zemel' <dz@zemellawllc.com>

Cc: Chad Diamond <chad.diamond@gmail.com>; Nicholas Linker <NL@zemellawllc.com>; Chad Echols <chad.echols@theecholsfirm.com>; Salley Odom <salley.odom@theecholsfirm.com>

Subject: RE: Hallager v ARS Discovery Responses

Daniel,

Are you also withdrawing the non-privilege objections as outlined in my letter?

Regarding depositions, I have requested my client's availability and will let you know when I have a response. I anticipate that my client will want me to depose your client. Please provide some available dates and we will re-notice his deposition. As before, it will be an in person deposition.

Finally, I believe we are required to mediate by September 17. Before we reach out to the mediator regarding her availability, do you want to engage in some settlement discussions? My recollection is that we still do not have a counter to the offer we made back in November. While I believe my clients will prevail at summary judgment based on the evidence produced to date, they may still be willing to put some money on the table to avoid the expense of the motion and depositions.

Thank you,

David A. Grassi

Attorney

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sender immediately by email and delete this communication and all copies.

From: Daniel Zemel <dz@zemellawllc.com>

Sent: Tuesday, August 10, 2021 4:40 PM

To: David Grassi <David.Grassi@theecholsfirm.com>

Cc: Chad Diamond <chad.diamond@gmail.com>; Nicholas Linker <NL@zemellawllc.com>; Chad Echols <chad.echols@theecholsfirm.com>; Salley Odom <salley.odom@theecholsfirm.com>

Subject: Re: Hallager v ARS Discovery Responses

David,

The client has been looking for any additional records but has not yet found any. Because subsequent reports and dispute letters are important, I have drafted this subpoena to Experian.

At this time, Plaintiff has no further credit report documents.

On Mon, Aug 2, 2021 at 6:38 PM Daniel Zemel <dz@zemellawllc.com> wrote:

Thanks. Let me take care of this by weeks end.

On Tue, Jul 27, 2021 at 12:49 PM David Grassi <David.Grassi@theecholsfirm.com> wrote:

Daniel,

How much time do you need? I don't mind some extra time, especially under the circumstances, but we also have some deadlines approaching so I do not think I can agree to more than a week.

Thanks,

David A. Grassi

Attorney

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From: Daniel Zemel <dz@zemellawllc.com>

Sent: Tuesday, July 27, 2021 11:56 AM

To: David Grassi <David.Grassi@theecholsfirm.com>

Cc: Chad Diamond <chad.diamond@gmail.com>; Nicholas Linker <NL@zemellawllc.com>; Chad Echols <chad.echols@theecholsfirm.com>; Salley Odom <salley.odom@theecholsfirm.com>

Subject: Re: Hallager v ARS Discovery Responses

David,

Steve has left my firm and a lot has fallen on my shoulders. I will respond to this but I need a bit more time. Is that okay?

On Mon, Jul 19, 2021 at 10:39 AM David Grassi <David.Grassi@theecholsfirm.com> wrote:

Counsel,

Please see the attached correspondence regarding Mr. Hallager's discovery responses.

Thank you,

David A. Grassi

Attorney

The Echols Firm, llc

224 Oakland Ave. (29730)

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all copies.

--

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--

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This email may contain a request to obtain personal and confidential information including dates of birth, medical records, and/or social security numbers. In sending documents with this kind of personal information, please do not send these documents to me using regular email correspondence. This type of information should be sent by fax transmission or by encrypted email.



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David A. Grassi
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August 20, 2021

VIA EMAIL ONLY

Chad Diamond
3356 Maywood Drive
Charlotte, NC 28205
chad.diamond@gmail.com

Daniel Zemel
Zemel Law, LLC
660 Broadway
Patterson, NJ 07514
dz@zemellawllc.com

RE: *Henry Hallager v. Account Resolution Services, LLC and Experian Information Solutions, Inc.*
Case No. 5:20-cv-00354-BO (E.D.N.C.)
Our File No. CIV-4586

Dear Counsel:

Enclosed, please find Defendant Healthcare Revenue Recovery Group, LLC's d/b/a ARS Account Resolution Services' Notice of Deposition with regard to the above-referenced matter which is being served on you as counsel for the Plaintiff.

Yours Very Truly,

A handwritten signature in blue ink, appearing to read "DAG", written over a light blue circular stamp.

David A. Grassi

Enclosure (as stated)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

HENRY HALLAGER,

Plaintiff,

v.

ACCOUNT RESOLUTION SERVICES,
LLC; EXPERIAN INFORMATION
SOLUTIONS, INC.,

Defendants.

Case No. 5:20-cv-00354-BO

NOTICE OF DEPOSITION

TO: Henry Hallager
c/o Chad Diamond, Esq.
Chad Diamond, P.A.
3356 Maywood Drive
Charlotte, NC 28205
Email: chad.diamond@gmail.com

and

Daniel Zemel, Esq.
Daniel Zemel LLC
1373 Broad St., Ste. 203-C
Clifton, NJ 07013
Email: DZ@zemellawllc.com

PLEASE TAKE NOTICE that Defendant Healthcare Revenue Recovery Group, LLC d/b/a ARS Account Resolution Services will take the deposition of Plaintiff Henry Hallager beginning at 12:00 PM on Friday, September 3, 2021 at Regus Business Center, 421 Fayetteville Street, Suite 1100, Raleigh, NC 27601. This deposition will be taken before a notary public or other officer duly authorized by law to administer oaths, and will be recorded by videographic and/or stenographic means.

The deposition will continue from day-to-day until completed.

Dated: August 20, 2021

/s/ David A. Grassi, Jr.

David A. Grassi, Jr. (N.C. Bar No. 38191)

The Echols Firm, LLC

P.O. Box 12645

Rock Hill, SC 29731

Phone: (803) 329-8970

Email: david.grassi@theecholsfirm.com

*Counsel for Defendant Healthcare Revenue
Recovery Group, LLC d/b/a ARS Account
Resolution Services*

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of August, 2021, the foregoing **Defendant Healthcare Revenue Recovery Group, LLC d/b/a ARS Account Resolution Services' Notice of Deposition of Plaintiff** has been served upon Plaintiff's counsel by Electronic Mail to the following address(es):

Chad Diamond
Chad Diamond, P.A.
3356 Maywood Drive
Charlotte, NC 28205
Email: chad.diamond@gmail.com

Counsel for Plaintiff

Daniel Zemel
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Clifton, NJ 07013
Email: DZ@zemellawllc.com

Counsel for Plaintiff

/s/ David A. Grassi, Jr.
The Echols Firm, LLC